

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES STEEL CORPORATION,  
NIPPON STEEL CORPORATION, and  
NIPPON STEEL NORTH AMERICA, INC.,

Plaintiffs

vs.

CLEVELAND-CLIFFS INC., LOURENCO  
GONCALVES, and DAVID McCALL,

Defendants.

Civil Action No. 2-25-cv-15

Hon. Marilyn J. Horan

**DECLARATION OF WILLIAM PIETRAGALLO, II IN SUPPORT OF DEFENDANTS  
CLEVELAND-CLIFFS INC. AND LOURENCO GONCALVES' OPPOSITION TO  
PLAINTIFFS' MOTION FOR EXPEDITED PROCEEDINGS**

I, William Pietragallo, II, make this declaration pursuant to 28 U.S.C. § 1746. I hereby state as follows:

1. I am a partner at the law firm Pietragallo Gordon Alfano Bosick & Raspanti, LLP, attorneys for Defendants Cleveland-Cliffs Inc. and Lourenco Goncalves (collectively, "Cleveland-Cliffs") in the above-referenced matter. I am an attorney licensed to practice in the State of Pennsylvania. I submit this Declaration in support of Cliffs' Opposition to Plaintiffs' Motion for Expedited Discovery. I have personal knowledge of the facts set forth herein, and if called as a witness, I would testify competently to them.

2. Attached hereto as **Appendix A** is a true and correct copy of public statements collected from public figures who oppose the U.S. Steel-Nippon transaction.

3. Attached hereto as **Exhibit A** is a true and correct copy of a August 3, 2023 letter from Thomas M. Conway, International President, United Steelworks Union, to U.S. Steel.

4. Attached hereto as **Exhibit B** is a true and correct copy of a transcript of a call hosted by Nippon Steel and U.S. Steel for investors on a December 18, 2023

5. Attached hereto as **Exhibit C** is a true and correct copy of an August 31, 2024 letter from Andrew Fair, Deputy Assistant Secretary for Investment Security Operations, Department of the Treasury to Ama Adams, Ropes & Gray LLP, and Mark Plotkin, Covington & Burling LLP.

6. Attached hereto as **Exhibit D** is a true and correct copy of a December 14, 2024 letter from Andrew Fair, Deputy Assistant Secretary for Investment Security Operations, Department of the Treasury to Ama Adams, Ropes & Gray LLP, and Mark Plotkin, Covington & Burling LLP.

7. Attached hereto as **Exhibit E** is a true and correct copy of a transcript of a call hosted by Raymond James for investors on February 2, 2024.

8. Attached hereto as **Exhibit F** is a true and correct copy of an October 9, 2022 article, “USW to rally for fair contract at U.S. Steel CEO appearance in Hobart,” written by Joseph S. Pete, published by the Northwest Indiana Times, and available at [https://www.nwitimes.com/news/local/usw-to-rally-for-fair-contract-at-u-s-steel-ceo-appearance-in-hobart/article\\_f4b0276d-3007-5b5e-8a83-cee0c9df47ca.html](https://www.nwitimes.com/news/local/usw-to-rally-for-fair-contract-at-u-s-steel-ceo-appearance-in-hobart/article_f4b0276d-3007-5b5e-8a83-cee0c9df47ca.html).

9. Attached hereto as **Exhibit G** is a true and correct copy of the March 15, 2024 Definitive Proxy Statement for the U.S. Steel-Nippon transaction.

10. Attached hereto as **Exhibit H** is a true and correct copy of the December 5, 2024 letter from U.S. Senators Sherrod Brown and Robert P. Casey, Jr to President Joseph R. Biden.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: January 14, 2025  
Pittsburgh, Pennsylvania

/s/ William Pietragallo, II  
William Pietragallo, II